

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SUZANNE BOELTER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 15-cv-03934-AT

JOSEPHINE JAMES EDWARDS, individually and on behalf of all others similarly situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 15-cv-09279-AT

**PLAINTIFFS' OBJECTIONS TO DEFENDANT HEARST COMMUNICATIONS,
INC.'S NOTICES OF VIDEOTAPED DEPOSITION TO PLAINTIFFS
SUZANNE BOELTER AND JOSEPHINE JAMES EDWARDS**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs Suzanne Boelter and Josephine James Edwards ("Plaintiffs") hereby object to Defendant Hearst Communications, Inc.'s ("Hearst") notices of videotaped deposition.

Deposition discovery during Phase I is premature and inefficient as it will likely result in Plaintiffs being noticed for more than one deposition in this class action case. *See Fed. R. Civ. P 30(a)(2)(A)(ii).* Plaintiffs offer to confer in good faith to resolve any issues that may arise by virtue of these objections.

Dated: August 29, 2016

Respectfully submitted,

By: /s/ Joseph I. Marchese

Joseph I. Marchese

BURSOR & FISHER, P.A.

Scott A. Bursor
Joseph I. Marchese
Philip L. Fraietta
888 Seventh Avenue
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
Email: scott@bursor.com
jmarchese@bursor.com
pfraietta@bursor.com

**CAREY RODRIGUEZ
MILIAN GONYA, LLP**

John C. Carey
David P. Milian*
Frank S. Hedin*
1395 Brickell Avenue, Suite 700
Miami, FL 33131
Telephone: (305) 372-7474
Facsimile: (305) 372-7475
E-Mail: jcarey@careyrodriguez.com
dmilian@careyrodriguez.com
fhegin@careyrodriguez.com
*Pro Hac Vice Application Forthcoming

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 29, 2016, I caused true and correct copies of the foregoing to be served on all counsel of record via e-mail.

/s/ Philip L. Fraietta
Philip L. Fraietta